



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

AUG 02 2011

Colonel Edward R. Fleming  
New Orleans District  
U.S. Army Corps of Engineers  
P.O. Box 60267  
New Orleans, LA 70160-0267

Dear Colonel Fleming:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) Region 6 has reviewed the U.S. Army Corps of Engineers Draft Environmental Impact Statement (DEIS) for the Louisiana Coastal Area (LCA) Barataria Basin Barrier Shoreline Restoration Project, located in Lafourche, Jefferson, and Plaquemines Parishes, Louisiana.

Based on our analysis, EPA rates the DEIS as "LO" (Lack of Objections). However, EPA offers suggested recommendations and minor comments for preparation of the Final EIS (FEIS). EPA has enclosed detailed comments which more clearly identify those areas of informational needs and improvements for the development of the Final EIS (FEIS).

EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004. Our classification will be published on the EPA website, [www.epa.gov](http://www.epa.gov), according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, please contact Michael Jansky of my staff at [jansky.michael@epa.gov](mailto:jansky.michael@epa.gov) or 214-665-7451 for assistance.

Sincerely,

Rhonda M. Smith  
Chief, Office of Planning  
and Coordination

Enclosure:

**DETAIL COMMENTS  
ON THE  
U.S. ARMY CORPS OF ENGINEERS  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
LOUISIANA COASTAL AREA (LCA)  
BARATARIA BASIN BARRIER SHORELINE RESTORATION PROJECT  
JEFFERSON AND PLAQUEMINE PARISHES, LOUISIANA**

**GENERAL COMMENT**

EPA continues to support the LCA program and remains committed to working with the Corps of Engineers (Corps) and our other partners to help expedite implementation of specific LCA restoration projects. We support measures to restore Louisiana's barrier islands and shorelines, including the Corps' "tentatively selected plan" which is comprised of Caminada Headland Alternative 5 and Shell Island Alternative 5.

EPA concurs with the Corps decision in this case not to use rocks or other hard structures as part of the proposed restoration project. EPA agrees that coastal restoration is most effective when it mimics natural structures and processes. Rocks and other hard structures are artificial measures, which are not consistent with the natural structure and processes associated with Louisiana's barrier islands and shorelines. As acknowledged in the subject DEIS, the use of rocks and other hard structures can result in adverse impacts, including increased erosion and disruption of sediment processes.

EPA also concurs with the Corps decision to use external sediment sources for much of the proposed restoration project. Specifically, the use of sediments from Ship Shoal and the Mississippi River will increase the amount of sediments in the Barataria system, thereby helping address to some extent the systemic sediment deficit in this and other coastal basins in Louisiana.

As the Corps DEIS acknowledges, the LCA program in general and this barrier shoreline project in particular represent critical near-term restoration measures which should not be mistaken for the larger and more comprehensive effort needed to address coastal wetland loss in Louisiana on the scale and scope warranted. Nevertheless, this and other LCA projects can be viewed as stepping stones towards larger and more aggressive projects, and offer valuable learning and adaptive management opportunities that will help in that regard.

We would recommend that the Corps consider revising Table 5.3, which provides cumulative impact data pertaining to various on-going wetland restoration and protection programs. Specifically, inclusion of compensatory mitigation data for civil works projects and the Clean Water Act (CWA) Section 404 program in this table could be

misinterpreted as suggesting that compensatory mitigation actions result in a net increase in wetlands. While a footnote clarifies that compensatory mitigation does not result in a net gain, including these numbers in a table entitled "Net Acres..." could nevertheless give the impression that these regulatory efforts produce a net gain. Additionally, the reader is not informed of the time period represented in this compensatory mitigation data. How many years of CWA Section 404 permitting data are included in the total of 15,228 acres of compensatory mitigation? In the absence of such information, the reader might erroneously assume that the CWA Section 404 program is authorizing impacts to an equivalent acreage on an annual basis.

Finally, please note that schedule and resource constraints have affected EPA's ability to fully engage in the interagency development and review of this LCA project. EPA greatly respects the views of our state and Federal partner agencies with responsibilities and expertise pertaining to fish and wildlife impacts. We would defer to some extent to the recommendations of the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and Louisiana Department of Wildlife and Fisheries on any additional information and analysis needed for resources within their purview. EPA encourages the Corps to fully address any such needs identified by these agencies.

## **TRIBAL CONCERNS**

The DEIS explains that in the event that archeological discoveries or tribal relics/remains are found, the State Historical Preservation Office (SHPO) will be notified, as is required; however, there was no mention of the State-recognized coastal tribes of Louisiana. Within the coastal areas near the project area, reside many tribal people, such as the United Houma Tribe. They use the Louisiana coastal waters and estuaries for subsistence fishing and trapping. While consultation with these tribes is not required due to the non-federal recognition of these tribes, it seems important to engage in special outreach efforts to the Houma and others. The project may inconvenience the tribal people in their fishing, but the benefit will far outweigh any negativity. They will clearly benefit from the successful restoration of the barrier islands, since their lands are slowly and steadily receding. Nevertheless, they should also be engaged in public participation in this project.

## **AIR QUALITY**

Any demolition, construction, rehabilitation, repair, dredging or filling activities have the potential to emit air pollutants and we recommend best management practices be implemented to minimize the impact of any air pollutants. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state and federal statutes and regulations.